

COUNTY OF SUFFOLK



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DEPARTMENT OF LAW

November 30, 2020

The Honorable Margo K. Brodie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Newkirk v. County of Suffolk, et al.*
Docket No.: 17-cv-2960 (MKB)(PK)

Dear Judge Brodie:

This Office represents the County of Suffolk, and Suffolk County Police Officer Mark Pav, defendants in the above referenced action. (County defendants) Pursuant to your Honor's order of November 19, 2020, the parties have conferred and wish to submit the following proposed briefing schedule for the County defendants' motion for summary judgement:

County Defendants Notice of Motion and Supporting papers to be served on or before
January 29, 2021.

Plaintiff's Opposition to be served on or before **March 5, 2021.**

County Defendants Reply and Fully Briefed Motion to be filed with the Court on or before
March 19, 2021.

We thank the Court for its consideration of this submission.

Respectfully submitted,

Dennis M. Cohen
Suffolk County Attorney

Brian C. Mitchell
Brian C. Mitchell
Assistant County Attorney

Cc: Brian T. Egan, Esq.
Christopher A. Bianco, Esq.
Michael J. Brown, Esq.
(Attorneys for the Plaintiff, via ECF)